

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE: **ROBERT EARL LEE) CASE NO. 3:15-BK-07287**
 DELORIS LEE) CHAPTER 13
 PO BOX 674) JUDGE MASHBURN
 LA VERGNE, TN 37086)
)
 SSN(1): XXX-XX-8299)
 SSN(2): XXX-XX-2437)
)

Debtors

MOTION FOR TURNOVER OF TITLE FOR DISPOSAL OF VEHICLE

Come now the Debtors, by and through the undersigned counsel, and gives notice to the Court and to creditors of the Debtors' request, pursuant to 11 U.S.C. §363(b), that Jefferson Capital Systems turnover the title for the 2009 Kia Sedona to the Debtors.

Debtors respectfully represent:

1. This is a request for the turnover of the title to the 2009 Kia Sedona.
2. Notice of this Motion was sent to: Jefferson Capital Systems, PO Box 7999, St Cloud, MN 56302.
3. The creditor was given notice of the Bankruptcy filing.
4. The Plaintiffs filed a voluntary petition under Chapter 13 of the Bankruptcy Code on October 11, 2015.
5. Defendant is a secured creditor and was listed in the Chapter 13 petition. Debtors surrendered the 2009 Kia Sedona at the Meeting of Creditors on November 24, 2015. Jefferson Capital Systems has not picked up the vehicle. Debtors need the title to the 2009 Kia Sedona in order to dispose of the vehicle and avoid incurring fines. All net proceeds from the sale of the vehicle will go the Chapter 13 Trustee.

WHEREFORE, Debtors respectfully pray that an Order be entered allowing:

1. Jefferson Capital Systems to turn over the title of the 2009 Kia Sedona to the Debtors.

2. Debtors will submit any proceeds from the disposal of the vehicle to the Chapter 13 Trustee.
3. For general relief

Respectfully Submitted,

/S/MARK PODIS
Mark R. Podis (BPR #012216)
Attorney for Debtors
1161 Murfreesboro Road Suite 300
Nashville, TN 37217
Phone (615) 399-3800
Fax (615) 399-9794
Email – PodisBankruptcy@aol.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion, Notice and Proposed Order, has been delivered to the Chapter 13 Trustee, PO Box 340019, Nashville, TN 37203; to the U.S. Trustee, Suite 318, Customs House, 701 Broadway, Nashville, TN 37203; mailed to Jefferson Capital Systems, PO Box 7999, St Cloud, MN 56302; and mailed to the debtors, on this the 22nd day of June 2018.

/S/MARK PODIS
Mark Podis